

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER DISASTER	:	21 MC 100 (AKH)
SITE LITIGATION	:	(All Cases)
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IN RE WORLD TRADE CENTER LOWER	:	21 MC 102 (AKH)
MANHATTAN DISASTER SITE LITIGATION	:	(All Cases)
-----X		
IN RE COMBINED WORLD TRADE CENTER	:	21 MC 103 (AKH)
AND LOWER MANHATTAN DISASTER SITE	:	(All Cases)
LITIGATION (straddler plaintiffs)	:	
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**NOTICE OF MOTION FOR AN ORDER COMPELLING  
THE WTC CAPTIVE INSURANCE COMPANY, INC. TO  
ALLOW CERTAIN ELIGIBLE PLAINTIFFS TO  
PARTICIPATE IN THE SETTLEMENT**

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**PLEASE TAKE NOTICE** that on a day to be determined by this Court, Plaintiffs'

Liaison Counsel, Worby Groner Edelman & Napoli Bern, LLP, counsel for the moving plaintiffs herein and Plaintiffs' co-Liaison Counsel for the plaintiffs in the 21 MC 100 docket, shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York located at 500 Pear Street, New York, New York, Room 14-D for an Order compelling the WTC Captive Insurance Company, Inc. to allow certain eligible plaintiffs to participate in the World Trade Center Litigation Settlement Process Agreement, As Amended.

**PLEASE TAKE FURTHER NOTICE** that Worby Groner Edelman & Napoli Bern, LLP shall move this Court for any additional appropriate relief in which this Court feels just and proper.

Dated: February 9, 2011

/s/ Christopher R. LoPalo  
Christopher R. LoPalo (CL-6466)  
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